

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE: Mary Allen	}	Case No.
	}	
	}	
Plaintiff	}	COMPLAINT
	}	
	}	
v.	}	July Demand Requested
	}	
Optimum Outcomes	}	
2651 Warrenville Rd, Suite 500	}	
Downers Grove, Illinois 60515	}	
	}	
Defendants	}	

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Now comes Plaintiff, by and through her attorneys, and, for her Complaint alleges as follows:

**JURISDICTION AND VENUE**

1. This court has jurisdiction pursuant to 28 U.S.C. Section 1331, 1337, 1367; and 15 U.S.C. section 1692(d).
2. Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

**PARTIES**

3. Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
4. Plaintiff is a resident of the State of Illinois.
5. Defendant, Optimum Outcomes, is a company with a corporate office in Illinois.
6. Unless otherwise stated herein, the term "Defendant" shall refer to Optimum Solutions.
7. Defendant regularly attempts to collect debts owed or due another.
8. At all relevant times, Defendant owned the Debtor or was retained to collect the Debt.

**FACTS OF THE COUNT**

9. In or around April, 2013, Defendant telephoned Plaintiff several times to collect on a debt, Plaintiff originally incurred from St. Alexian Medical Center.
10. On or about April 12, 2013, Plaintiff retained Chang & Carlin, LLP for the filing of a Chapter 13 Bankruptcy relief under the United States Bankruptcy Code.
11. Chang & Carlin, LLP faxed a letter of retainer to Defendant. See Exhibit A.
12. Defendant has made at least one collection call to Plaintiff since this time.
13. Defendant has damages Plaintiff.
14. Defendant has violated the FDCPA.

**JURY DEMAND**

15. Plaintiff demands a trial by jury.

**PRAYER FOR RELIEF**

16. Plaintiff demands the following relief:
  - a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result of Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. Section 1692(a)(1);
  - b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to Section 1692(a)(2)(A);
  - c. Judgment against Defendant for Plaintiff's reasonable attorney's fees and costs incurred in this action, pursuant to 15 U.S.C. Section 1692k(a)(3); and
  - d. Any other legal and/or equitable relief as the Court deems appropriate.

Respectfully submitted,

/s/ John Carlin  
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